

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JERRY SERGENT,

Plaintiff,

-against-

PROFESSIONAL RECOVERY SERVICES, INC.,

Defendant(s).

ANSWER

08 CIV 5906
(Berman, J)

-----x

Defendant, by its attorney MEL S. HARRIS AND ASSOCIATES, LLC, answer plaintiff's complaint as follows:

1. Defendant admits that this matter has been brought pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.

2. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "2" of the complaint.

3. Defendant admits the allegations contained in paragraph "3" of the complaint.

4. Defendant admits that the Court has jurisdiction pursuant to 15 USC 1692(k), but specifically denies that venue is proper.

5. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "5" of the complaint.

6. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "6" of the complaint.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant admits the allegations contained in paragraph "12" of the complaint.

13. Defendant admits the allegations contained in paragraph "13" of the complaint.

14. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant admits the allegations contained in paragraph "16" of the complaint.

17. Defendant admits the allegations contained in paragraph "17" of the complaint.

18. Defendant denies the allegations contained in paragraph "18" of the complaint.

19. Defendant admits sending correspondence to the plaintiff on or about May 19, 2008, but otherwise denies the allegations contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies each and every allegation contained in paragraph "26" of the complaint.

27. Defendant denies each and every allegation contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. Defendant denies each and every allegation contained in paragraph "31" of the complaint.

32. Defendant denies each and every allegation contained in paragraph "32" of the complaint.

33. Defendant denies each and every allegation contained in paragraph "33" of the complaint.

34. Defendant denies each and every allegation contained in paragraph "34" of the complaint.

35. Defendant denies each and every allegation contained in paragraph "35" of the complaint.

36. Defendant denies each and every allegation contained in paragraph "36" of the complaint.

37. Defendant denies each and every allegation contained in paragraph "37" of the complaint.

38. Defendant denies each and every allegation contained in paragraph "38" of the complaint.

39. Defendant denies each and every allegation contained in paragraph "39" of the complaint.

40. Defendant denies each and every allegation contained in paragraph "40" of the complaint.

41. Defendant denies each and every allegation contained in paragraph "41" of the complaint.

42. Defendant denies each and every allegation contained in paragraph "42" of the complaint.

43. Defendant denies each and every allegation contained in paragraph "43" of the complaint.

44. Defendant denies each and every allegation contained in paragraph "44" of the complaint.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
August 11, 2008



Arthur Sanders (AS1210)
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TO:

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